

/s/ Perry Pinon
PERRY PINON
Attorney for Plaintiff
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PLAINTIFF'S LIST OF POTENTIAL WITNESSES

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| 1. | April Cadena | Plaintiff |
| 2. | Martha Rios | Plaintiff's mother |
| 3. | Arturo Loera | Plaintiff's stepfather |
| 4. | Christopher Cadena | Plaintiff's brother |
| 5. | Vanessa Cadena | Plaintiff's sister |
| 6. | Luis Alberto Vargas | Plaintiff's occasional employer |
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| 7. | Alma Leyva | Former inmate |
| 8. | Davie Romero | Former inmate |
| 9. | Rosemary Pacheco | Former inmate |
| 10. | Leticia Vera | Former inmate |
| 11. | Maria Minton | Former inmate |
| 12. | Norma Puga | Former inmate |
| 13. | Crystal Nazario | Former inmate |
| 14. | Cara Lyn Rodenhaver | Former inmate |
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| 15. | Alberto Puebla | Former inmate |
| 16. | Michael Buchanon | Former inmate |
| 17. | Mark Ramey | Former inmate |
| 18. | Albert Valdez | Former inmate |
| 19. | Albert Blaine Waldo | Former inmate |
| 20. | Harold Ryals | Former inmate |
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21. Any and all medical providers of Plaintiff identified by Plaintiff in her expert witness disclosure which was filed with the Court and their custodians of records.

22. Dr. Thomas Alost, M.D. Treating physician - Providence
 23. Daphne Marie Jones, RN Treating nurse - UMC/WSAT
 24. Dr. Amr Mohammed Abdelgawad, M.D. Treating physician - Texas Tech/UMC
 25. Dr. Casey Mullen, M.D. Treating physician - Texas Tech/UMC
 26. Dr. Nicholas Joel Rensing, M.D. Treating physician - Texas Tech/UMC
 27. Dr. Jonathan Cook, M.D. Treating physician - Texas Tech/UMC
 28. Elizabeth Pimentel, RN Treating nurse - Texas Tech
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29. Any and all records custodians of any medical records or other records, including billing records, relating to plaintiff.
 30. Custodian of Records - medical records or other records, including billing records
The Hospitals of Providence - Memorial Campus
 31. Custodian of Records - medical records or other records, including billing records
RespMed HomeCare Unlimited, Inc.
 32. Custodian of Records - medical records or other records, including billing records
Dr. Thomas Alost, M.D. and
Paso Del Norte Surgery Center
 33. Custodian of Records - medical records or other records, including billing records
University Medical Center and its Clinics including
Women's Substance Abuse Treatment Center (WSAT)
 34. Custodian of Records - medical records or other records, including billing records
Texas Tech Physicians
Texas Tech University
Health Sciences Center at El Paso
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35. Custodian of Records
Office of the Inspector General
U.S. Department of Justice
950 Pennsylvania Ave, Room 4706
Washington, D.C. 20530 (202) 514-3435
Records: 1) Pinon FOIA letter;
2) Letter stating absence of record of receipt of letter from April Cadena, or
3) Affidavit with letter stating absence of record of receipt of letter from
April Cadena (Note: Plaintiff does not have this yet)

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36. EPPD Off. I Rodriguez #2847 Arresting officer
37. EPPD Off. J. Martinez #2641 Arresting officer
38. Custodian of Records
El Paso Police Department
Records: Report for the arrest of April Cadena on June 23, 2014, EPPD #14-174237.
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39. Custodian of Records
El Paso County Auditor's Office
Records: Records of County's payments to Healthcare Providers for Services to Inmates FY2014 & FY2015
40. Luis Martinez El Paso County Accounts Payable Manager
41. Custodian of Records
El Paso County Clerk
500 E. San Antonio, Ste 105
El Paso, Texas 79901
Tele: (915) 546-2071
Fax: (915) 546-2012
Records: April Cadena's misdemeanor case records: 20130C02054, 20130C12608, 20130C12609, 20130C12680, 20140C01344.
42. Custodian of Records
El Paso District Clerk
Records: April Cadena's State Jail Felony case record
43. Judge William E. Moody Judge who issued capias and then returned Cadena to WSAT.
34TH Judicial District Court
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44. Custodian of Records
El Paso County Sheriff
3850 Justice
El Paso, TX 79938
(915) 538-2292
Records: Regarding April Cadena and June 23-July18 incarceration
Inmate file for April Cadena
Booking docket records
Records of Orders to Release/Detain
Dismissal Orders
Property Receipts/Personal Property Receipts
Custody Assessment Scale/Classification Review/Reclassification
Classification Interview

Daily Activity Reports
 Morning reports
 Facility Work Schedules
 Inmate In/Out Logs
 Inmate transfer records
 Inmate List/Inmate Special Medical Instructions
 Incident report
 Grievances
 Grievance response
 Inmate Commissary Account Records
 Emails regarding scheduling of surgery and discussion of releasing April Cadena
 Records of April Cadena's incoming and outgoing mail.
 Health Services Agreement with Corizon including all addendums;
 Detention Facility ADA Reports including final reports;
 Detention Services Policy and Procedure and Procedure Manual;
 Chapter 3.09 Administrative Separation
 Chapter 4.01 Health Services
 Chapter 8.04 Housing and Guard Station Officer Post Order
 Chapter 8.10 Housing and Guard Station Floor Control Officer Post Order

 Health Services Plan;
 Inmate release records and related records including court orders, emails related to
 jail pleas and other court settings and appointments; emails from jail administrators
 or supervisors or their employees; Charge Dispositions, and sentence calculations;

45.	Rosalia Estrada	Det. Officer; Intake Officer, Downtown Jail
46.	Francisco Ortiz	Det. Officer; Classification Officer, Downtown Jail
47.	Margie Lopez	Det. Officer; Floor Officer, Downtown Jail
48.	Monica Davila	Det. Officer; Floor Officer, Downtown Jail
49.	Jose Pina	Det. Officer; Floor Officer, Downtown Jail
50.	Gloria Gallardo	Det. Officer; Floor Officer, Downtown Jail
51.	Karin Gunsenhouser	Corporal; Supervisor, Downtown Jail
52.	Margie Lopez	Det. Officer; Floor Officer, Downtown Jail
53.	Daniele Rael	Det. Officer; Floor Officer, Downtown Jail
54.	Moises Ortega	Corporal; Supervisor, Downtown jail

55.	Richard Wiles	El Paso County Sheriff
56.	James Nance	Lieutenant; Downtown jail administration/management
57.	Alma Naylor	Det. Officer; Floor Officer, Downtown jail
58.	Marco Vargas	Sheriff's department employee - Former Jail Commander
59.	Sylvia Aguilar	Chief Deputy Sheriff; Sheriff's department employee
60.	Stephanie Gonzalez	Court Coordinator Clerk, Inmate Processing Unit
61.	Ruby Moreno	Court Coordinator Clerk, Inmate Processing Unit
62.	Bill Stone	Grievance Officer
63.	Martin Chavarria	Sheriff's department employee
64.	<hr/> Custodian of Records Corizon Health, Inc. Records: Medical records for April Cadena; Medical records obtained or received by Corizon from other healthcare providers. Employee and Subcontractor Work schedules; General Health Services Policy & Procedures Manual - Jail; Policies, procedures and protocols; Standing Orders; Cadena Bates 381-825 Physician Agreement between Corizon, Prison Medical PA, and Ivor Garlick, M.D. PHS Employee Handbook	
65.	Dr. Alex Salazar, M.D.	Defendant, Corizon jail physician and medical director
66.	Charles Guffey	Regional Vice President of Defendant Corizon
67.	Carlos Fuentes, RN	Former Corizon nurse (Aka: "Charlie" and "Sponge Bob")
68.	Stephanie Portillo, LVN	Former Corizon nurse (Aka: Stephanie Francesca Portillo)
69.	D. Carranza, LVN	Former Corizon nurse
70.	Eduardo Chavez, LVN	Former Corizon nurse (Aka: Eduardo Antonio Chavez)
71.	Maria Valadez LVN	Former Corizon nurse
72.	Guadalupe Diaz, RN	Former Corizon nurse

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| 73. | Keith Barnes, PA | Former Corizon Physician Assistant |
| 74. | Melissa Brown, RN | Former Corizon nurse |
| 75. | Claudia Chaparro, RN | Former Corizon psychiatric/Mental Health NP |
| 76. | Marissa Viera, HUC | Former Corizon Health Unit Coordinator |
| 77. | Marcella Aguilar | Former Corizon Director of Nurses |
| 78. | Deborah Martinez | Former Corizon nurse |
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| 79. | Perry Pinon | Attorney representing Plaintiff - for attorney fees |
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80. Plaintiff additionally identifies all persons identified by Defendant El Paso County in its list of potential witnesses except its experts.
81. Plaintiff additionally identifies all persons identified by Defendant Corizon Health, Inc. In its lists of potential witnesses except its experts.
82. Plaintiff additionally identifies all persons identified by Defendant Alex Salazar in his list of potential witnesses except his experts.

LIST OF PROPOSED EXHIBITS

No	Description	Bates #	Offered	Admitted	Refused
1	El Paso Police Department Report #14-174237				
2	Providence Memorial Hospital medical records for April Cadena (w/Aff.)				
3	Providence Memorial Hospital x-rays for April Cadena (w/Aff.)				
4	RespMed medical and durable medical equipment records for April Cadena (w/Aff.)				
5	Corizon Medical Records for April Cadena				
6	UMC Medical Records for April Cadena (w/Aff.)				
7	UMC x-ray records for April Cadena (w/Aff.)				
8	UMC - Mattox (WSAT) Medical Records for April Cadena (w/Aff.)				
9	UMC Medical Bill records for April Cadena (w/Aff.)				
10	Texas Tech Medical Records for April Cadena (w/Aff.)				
11	Texas Tech x-rays for April Cadena (w/Aff.)				
12	Texas Tech Medical Bills for April Cadena (w/Aff.)				
13	County's contract with Corizon with amendments (Inmate Health Services Agreement)				
14	Records of County's payments to Healthcare Providers for Services to Inmates FY2014 & FY2015				
15	County's record of medical bills it has paid for services provided to Mrs. Cadena by off-site medical providers for the injury sustained on June 25, 2014				

16	Dr. Alex Salazar Resume	Cadena 379-380 341-343			
17	Dr. Salazar Answers to Interrogatories (Excerpts)				
18	Dr. Salazar's Deposition and exhibits (Excerpts)				
19	Charles Guffey Deposition & exhibits (Excerpts)				
20	Texas State Board of Nurses - result of search for status of license for Charles Guffey				
21	Texas State Board of Nurses - result of search for status of license for Stephanie Portillo				
22	Corizon's answers to interrogatories (Excerpts)				
23	Corizon medical records for April Cadena				
24	Corizon employees' work schedules				
25	Corizon General Health Services Policy & Procedures Manual - Jail (Excerpts)				
26	Corizon Documents Bates - Cadena 381-825 (excerpts)				
27	Corizon standing orders.				
28	Corizon/PHS Employee Handbook				
29	Physician Agreement between Corizon, Prison Medical PA, and Ivor Garlick, M.D.				
30	Detention Facility ADA reports				
31	County's copy of Corizon medical records for April Cadena (w/ Aff.)				
32	Detention Services Policy and Procedure Manual (excerpts) (Jail Records)				
33	Administration Separation Chapter 3.09 (Jail Records)				
34	Health Services Chapter 4.01 (Jail Records)				

35	Housing and Guard Station Officer Post Order Chapter 8.04 (Jail Records)				
36	Housing and Guard Station floor Control Officer Post Order Chapter 8.10 (Jail Records)				
37	Health Services Plan (Jail Records)				
38	Inmate file for April Cadena (Jail Records)				
39	Booking docket records for April Cadena (Jail Records)				
40	Records of Orders to Release/Detain April Cadena (Jail Records)				
41	Dismissal Orders from Courts for April Cadena (Jail Records)				
42	Property Receipts/Personal Property Receipts for April Cadena (Jail Records)				
43	Custody Assessment Scale/Classification Review and Reclassifications of April Cadena (Jail Records)				
44	Classification Interview of April Cadena (Jail Records)				
45	Daily Activity Reports (Jail Records)				
46	Morning Reports (Jail Records)				
47	Gloria Gallardo Daily Activity Report (Jail Records)				
48	Facility Work Schedules (Jail Records)				
49	Inmate In/Out Logs (Jail Records)				
50	Inmate transfer records (Jail Records)				
51	Inmate List/Inmate Special Medical Instructions (Jail Records)				
52	Incident Report for April Cadena's injury (Jail Records)				
53	Grievances - April Cadena (Jail Records)				
54	Responses to April Cadena's grievances (Jail Records)				

55	Emails requesting approval of surgery and the scheduling of surgery and discussion of releasing April Cadena (Jail Records)				
56	Records of April Cadena's incoming/outgoing mail (Jail Records)				
57	Photographs of the interior of the jail				
58	Lockdown Jail Cell Dimensions (Jail Records)				
59	Inmate file (Jail Records)	Cadena CA 1025-1063			
60	Jail Inmate List (Jail Records)	Cadena CA 956			
61	Jail morning & daily activity reports, work schedules, inmate in/out logs (Jail Records)	Cadena CA 920-945; 948-955; 957-971			
62	Incident report for Mrs. Cadena's fall on June 25, 2014 (Jail Records)	Cadena CA 915-918			
63	Gallardo daily activity report (Jail Records)	Cadena CA 946-947			
64	Gallardo statement re: grievance (Jail Records)	Cadena CA 921			
65	Deposition of Alex Salazar				
66	Deposition of Charles Guffey				
67	Deposition of Monica Davila				
68	Deposition of Gloria Gallardo				
69	Deposition of Jose Pina (Soon to be taken)				
70	Deposition of Karin Gunsenhouser				
71	Deposition of Margie Lopez				
72	Deposition of Daniele Rael				
73	Deposition of Moises Ortega				
74	Deposition of Alma Naylor				

75	Deposition of Marco Vargas				
76	Grievances filed by April Cadena (Jail Records)	Cadena CA 422-436			
77	Jail investigation of grievances (Jail Records)	Cadena CA 919 - 920			
78	County Jail Commissary Account (Jail Records)	Cadena CA 1023-1024			
79	April Cadena's receipts for purchases in the jail				
80	April Cadena Grievance letter to Inspector General Dept. of Justice				
81	U.S. Dept. Justice letter stating absence of record of letter from April Cadena				
82	U.S. Dept. Justice letter stating absence of record of letter from April Cadena (with affidavit) (being requested)				
83	April Cadena's misdemeanor case records: 20130C02054, 20130C12608, 20130C12609, 20130C12680, 20140C01344.				
84	April Cadena's State Jail Felony case records				
85	Any exhibits identified by Dr. Alex Salazar				
86	Any exhibits identified by Corizon Health				
87	Any exhibits identified by El Paso County				
88	County's answers to interrogatories				
89	Texas Medical Board Public Verification of License of Amr Abdelgawad				
90	Texas Medical Board Public Verification of License of Thomas Alost				

Respectfully submitted,

/s/ Perry Pinon
PERRY PINON
Attorney for Plaintiff
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CERTIFICATE OF SERVICE

I hereby certify that on this the 21 day of July 20 17, Plaintiff's Second Amended Designation of Potential Witnesses and List of Proposed Exhibits was delivered to Defendant COUNTY OF EL PASO, by and through its attorneys of record, Kevin McCary and Jo Anne Bernal, El Paso County Attorney, 500 E. San Antonio, Rm. 503, El Paso, Texas 79901, Tele: 915.546.2083; Fax: 915.546.2133; kmccary@epcounty.com, and Defendant CORIZON HEALTH INC, and Defendant Alex Salazar, by and through their attorneys of record, Henry J. Paoli and Francisco J. Ortega and the law firm of Scott Hulse, P.C., 1100 Case Tower 201 E. Main Dr., El Paso, Texas 79901, Tele: 915.533.2493; Fax: 915.546-8333; hpao@scotthulse.com, in the following manner:

CM/ECF email X

/s/ Perry Pinon
Perry Pinon